

Facility Name ULAND CORPORATION

EPA ID Number NY 0915 765 38

Category 3c 3

Date of doc. 6/15

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Project Manager Signature Michael R. Johnson

**RCRA INSPECTION REPORT**  
**Ulano Corporation**  
**280 Bergen Street ( 110 Third Avenue)**  
**Brooklyn, NY 11217**

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**EPA Inspector:** Abdool Jabar, Environmental Engineer  
**State Inspector:** Hassan Hussein, P.E., Environmental Engineer  
**Date of Inspection:** June 15, 2000  
**Time of Inspection:** 2:30 pm to 4:30 pm  
**EPA Handler ID #:** NYD091576538  
**Reason for Inspection:** Compliance Inspection

**Attendees:**

Abdool Jabar, USEPA Region II DECA-RCB, (212) 637-4131 ,  
Hassan Hussein, NYSDEC Region II  
Max Cohen, Safety & Environmental Officer  
Raj Daniels, Director of Operations

**Background:**

This facility is a manufacturer of films for the graphic arts and screen printing industry and also formulates emulsions for the same industry. The facility buys polyester films in large rolls (5000 feet rolls) and coats them with two types of emulsions; polyvinyl alcohol -based and gelatin-based, in yellow light. The facility has three machines that are used to apply the coating solutions on the polyester film. Two machines are used to coat films with the polyvinylalcohol- based solution. No hazardous waste is produced from this operation. The other machine is used to coat the film with a gelatin-based solution. First, the cement is applied to the film after which the galatin solution is applied on to the film. After the solutions have been applied, the film is then run through a series of heaters. After that, the film is cut according to the customers specifications. The film is sold worldwide.

The solvent-based cement is made in lots of 100 gallons at a sister plant located at 601 Bergen Street and transported to the 230 Bergen Street site. After the material is used, the remainder is tested by the facility's Quality Control Lab to determine if it can be reused. The material is then transported back to 601 Bergen Street. The facility representatives stated that if the material can be reused, then it is reformulated to make another batch of cement. He further stated that the material that cannot be used is placed in the container storage area at the 601 Bergen Street location. The inspector stated that if it has been determined that the solvent-based cement can no longer be used, then it is a hazardous waste and cannot be transported to the 601 Bergen Street location.

**Inspection Summary:**

An opening conference was conducted with the inspector and the facility representatives. The inspector explained the purpose of the inspection and asked that the facility's records be made available for review. The inspector and the facility representatives then proceeded on a tour of the facility. The facility has five laboratories on the second floor; two of the laboratories are for quality control and the other three are for Research and Development. Labs 1 and 4 were first visited; in each of the laboratories, there was one 5 gallon container used for satellite accumulation. In the 3 R & D labs, research is done to test the films to find out the resistance to various types of solvents. Small amount of solvents are smeared on the

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**6/7/00**

**Inspection summary-601 Bergen Street (EPA ID # NYD001725870)**

When the inspectors arrived at the 280 Bergen Street facility, Mr. Cohen was out, Mr. Daniels located some of the records of the 601 Bergen Street facility and the inspectors reviewed these but there were many questions that Mr. Daniels could not answer. He told the inspectors that Mr. Cohen will be in after lunch. The inspectors proceeded to lunch. Mr. Cohen arrived after lunch and a conference with Mr. Cohen, Mr. Daniels and the inspectors took place. The facility representatives provided background information of the two facilities. The inspectors inquired about another Ulano site which was listed in RCRIS and was located at 255 Butler Street. Mr. Daniels stated that the building has been mostly offices and was sold and the offices were relocated at 280 Bergen Street. The inspectors informed the facility representatives that the facility at 601 Bergen was listed as a large quantity generator in the RCRIS, but a review of the manifests for the past 2 years indicated that the facility is a small quantity generator. The manifests for 601 Bergen Street is located in the office of Mr. Max Cohen at 280 Bergen Street. The inspectors then reviewed the records. Some of the signed copies of the manifests were not in the files. The emergency preparedness documentation was not found. The facility was given one week to put their paperwork in order.

The inspectors asked the facility how they got rid of their used fluorescent tubes and lead-acid batteries. The facility representatives stated that the fluorescent tubes were removed by the electrical contractor and when the lead acid batteries were replaced, they are taken back to the company by the servicemen. The inspectors informed the facility representatives that the spent fluorescent tubes should be handled as universal hazardous waste and the spent lead-acid batteries should also be handled as a hazardous waste. The inspectors then proceeded to tour the Ulano facility at 601 Bergen Street. There were no fluorescent tubes nor lead acid batteries at the site at the time of the inspection.

The first area visited was the container storage area which was fenced but did not have a roof. There were 21 drums of hazardous waste stored in this area. The drums were not labeled and the accumulation start dates were not on the drums. There was no aisle space between the drums in the container storage area. There was secondary containment but due to heavy rainfall during the previous night, there was water in the containment area. There was no alarm system or telephone in the container storage area.

The next area visited was the area where the cement is formulated. Solvents are mixed in various proportions and agitated. The material is then transported to 280 Bergen Street. At the time of the inspection, there was a drum containing about 15 gallons of hazardous waste in a satellite accumulation area. The drum was not labeled with the words "hazardous waste" and other words to describe the contents. There was a rag lying on top of a container and the facility representative was asked what is done to the rags that were used for cleaning small amounts of liquids that may be spilled at times. The operator stated that the rags were disposed in the regular trash. The inspectors informed the facility that the rags would be a

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**280 Bergen Street ( 110 Thlr Avenue)**  
**Brooklyn, NY 11217**

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listed hazardous waste and cannot be disposed in the regular trash. The facility representative stated that the rags will now be placed in a 5 gallon closed container and treated as hazardous waste. The inspectors then visited the raw material storage area. There was no concern in this area. All the drums storing material were in good condition. The inspection ended at 4.15 pm.

**6/15-Inspection Summary**

The inspection started with a review of the records for the 601 Bergen Street facility at Mr. Cohen's office. The signed copies of the manifests were located and reviewed and found to be in order. The facility did not locate the documentation to show that arrangements were made with the local authorities. The inspectors then inspected the 280 Bergen Street (see attached report) and then proceeded to lunch. After lunch, the inspectors went to the facility at 601 Bergen Street. The first area visited was the container storage area. The twenty one drums that were in the container storage area were now labeled with the words "hazardous waste" and the accumulation start dates were all on the containers. The drums were arranged with aisle spaces between them. The containment area was dry. An alarm and a telephone was installed next to the container storage area.

The next area visited was the operations area. The 55 gallon container in the satellite area was now labeled. There was also a labeled 5 gallon container to store rags in this area. A phone was located in an office about fifteen feet from the work area. The name and phone number of the emergency coordinator was not posted next to the telephone. The locations of the fire extinguishers, spill control material and the fire alarm were not posted near to the telephone.

The facility owned an adjoining five story building at the 601 Bergen Street site and are now in the process of refurbishing that building for rental. The inspectors toured the building. The electrical contractor was working in the building and the inspectors reiterated that the spent fluorescent tubes should be discarded as universal hazardous waste. There were also a number of computers and monitors stored in the building. The facility was advised that they need make a hazardous waste determination if they were going to discard the monitors. The inspectors then left for the 280 Bergen Street facility where a closed out conference was held. The inspectors discussed their concerns at the conference.

**Record Review**

The following records were reviewed.

**(1) Manifests and LDR forms**

Manifests and LDR forms for the last three years were reviewed and found to be in order.

**(2) Arrangements with Local authorities.**

There is no documentation to show that the facility has made the appropriate arrangements with the police department, fire department, hospital and the emergency response team.

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**(3) Drum storage inspection logs.**

At the time of the inspection, the facility representatives stated that the inspections were not done and there were no logs.

**Observation**

Waste generated at the Ulano sister facility located at 280 Bergen Street, was transported to this facility. According to New York State 's interpretation of the RCRA regulations, this is permissible. This matter has been sent to EPA headquarters for review and until a resolution of this matter, this action cannot be listed as a violation.

**Violations**

- Corrected*  
*Corrected*  
*Corrected*
- (1) One container in the satellite accumulation area was not labeled with the words "hazardous waste" and other words to identify its contents.
  - (2) In the container storage area, there were 21 containers which were not labeled with the words "hazardous waste" and other words to identify their contents.
  - (3) The twenty one containers in the container storage area were not marked with the accumulation start dates.
  - (4) Weekly inspections of the container storage area were not done
  - (5) The name and phone number of the emergency coordinator were not posted next to the telephone.
  - (6) The location of fire extinguishers, spill control material and fire alarm were not posted next to the telephone.
  - (7) No arrangements were made to familiarize the local hospital with the properties of hazardous waste handled at the facility and the types of injuries and illnesses which could result from fires, explosions or releases at the facility.
  - (8) No arrangements were made to familiarize the police, fire departments and emergency response teams with the functions and layout of the facility.
  - Corrected* (9) Failure to make a hazardous waste determination (About ten pounds of rags per month thrown in regular trash).
  - Corrected* (10) There was no alarm or telephone in the container storage area.
  - (11) The container storage area was not free of liquids. }

**Recommendation**

Due to the fact that the hazardous waste is shipped off-site every 6 months, it is recommended that an NOV be sent to the facility.

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Part IV

SMALL QUANTITY GENERATOR (SOG)

Indicate:

X Violations

Indicate:

X Satisfactory

NA Not Applicable

SOG - Small Quantity Generator - The generator who generates more than 100 kg/mo but less than 1,000 kg/mo of non-acute hazardous waste in a calendar month, and accumulates less than 6,000 kg on-site has complied with the following:

1. General Requirements - 372.2(a)

- |     |   |   |    |
|-----|---|---|----|
| (a) | X | The generator has made a determination as to whether or not his solid waste is a hazardous waste - 372.2(a)(2).   | —  |
| (b) | — | The generator has obtained an EPA identification number - 372.2(a)(3)(i).   | X  |
| (c) | — | The generator has not offered hazardous waste to transporters or to treatment, storage, or disposal facilities that have not received an EPA identification number - 372.2(a)(3)(ii). | X  |
| (d) | — | The quantity of non-acute hazardous waste accumulated on-site never exceeds 6,000 kg. - 372.2(a)(8)(iii)(a).  | X  |
| (e) | — | Waste may be stored for up to 180 days unless the disposal facility is 200 miles or more away. Storage up to 270 days is then allowed - 372.2(a)(8)(iv).                              | X  |
| (f) | — | At all times there must be at least one employee on-site or on call with the responsibility for coordinating emergency measures - 372.2(a)(8)(iii)(a)(1).                             | X  |
| (g) | X | The name and phone number of the emergency coordinator must be posted next to the telephone - 372.2(a)(8)(iii)(a)(2)(i).  | —  |
| (h) | X | The location of fire extinguishers and spill control material and, if present, fire alarm must be posted next to the telephone - 372.2(a)(8)(iii)(a)(2)(ii).                          | —  |
| (i) | — | The telephone number of the fire department must be posted next to the phone unless the facility has a direct alarm - 372.2(a)(8)(iii)(a)(2)(iii).                                    | NA |
| (j) | — | The generator has ensured that all employees are thoroughly familiar with proper waste handling and emergency procedures - 372.2(a)(8)(iii)(a)(2).                                    | X  |

## Indicate

## Indicate

X Violations

X Satisfactory  
NA Not Applicable

- (d) ☐ Hazardous waste is stored in containers made of compatible materials - 373-3.9(c).  
(If not, please explain.) X
- 
- (e) ☐ All containers except those in use are closed - 373-3.9(d)(1). X
- (f) ☐ Containers holding hazardous waste must not be opened, handled or stored in a manner which may rupture the containers or cause them to leak - 373-3.9(d)(2). X
- (g) ☒ The container storage area is inspected at least weekly - 373-3.9(e). —
- (h) ☐ The generator complies with the following special requirements related to incompatible wastes - 373-3.9(g):
- (1) ☐ Incompatible wastes, or incompatible wastes and materials, are not placed in the same container, or in an unwashed container that previously held an incompatible waste or material unless the placement is conducted to prevent the following - 373-3.9(g)(1) & (2): NA
- (a) ☐ the generation of extreme heat or pressure, fire or explosion, or violent reaction - 373-3.2(h)(2)(i);
- (b) ☐ production of uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(ii);
- (c) ☐ production of uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions - 373-3.2(h)(2)(iii);
- (d) ☐ damage to the structural integrity of the device or facility containing the waste - 373-3.2(h)(2)(iv); or
- (e) ☐ a threat to human health or the environment - 373-3.2(h)(2)(v).
- (2) ☐ Containers holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks, or surface impoundments must be separated from the other materials or protected from them by means of a dike, berm, wall, or other device - 373-3.9(g)(3). ↓

IndicateIndicateX ViolationsX Satisfactory  
NA Not Applicable

(c)      The transporter has a valid Part 364 permit or is otherwise authorized to transport the waste to the designated facility - 372.2(b)(5)(ii). X

(d)      The generator offers for shipment or ships hazardous waste to an authorized facility. - 372.2(b)(5)(iii). X

If violation is checked, please provide details.

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(e)      Each manifest is completed in accordance with the instructions found in Appendix 30 of Part 372 - 372.2(b)(1). [Indicate items in violation]

	Generator	Trans 1	Trans 2	TSDP		
(1) <u>    </u>	Name of <u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	X
(2) <u>    </u>	EPA ID No. of <u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	X
(3) <u>    </u>	Mailing Address of <u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	X
(4) <u>    </u>	Telephone No. of <u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	X
(5) <u>    </u>	Manifest Document # <u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	X
(6) <u>    </u>	The proper USDOT description.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	X
(7) <u>    </u>	The appropriate: <u>✓</u> quantity, <u>✓</u> container number, <u>✓</u> container type, and <u>✓</u> waste type by units of weight or volume.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	X
(8) <u>    </u>	Signed certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the USDOT and NYSDEC.	<u>    </u>	<u>    </u>	<u>    </u>	<u>    </u>	X

(f)      The generator has received signed copies (from the TSD facility) of all manifests for wastes shipped off-site more than 45 days ago: X

     If not, exception reports have been submitted covering these shipments - 372.2(c)(3). NA

(g)      The generator must distribute copies of the manifest as specified on the manifest form, postmarked within five (5) business days of the shipment date - 372.2(b)(3). X



Indicate

X Violations

Indicate

X Satisfactory

NA Not Applicable

- (l)      A copy of each manifest has been kept for at least three years from the date the waste was accepted by the initial transporter - 372.2(c)(1)(i). X
- (m)      A copy of each Exception Report must be kept for a period of at least three years from the due date of the report - 372.2(c)(1)(ii). NA
- (n)      A generator must keep records of any test results, waste analyses, or other determinations made in accordance with Part 372.2(a)(2) for at least three years - 372.2(c)(1)(iii). X
- (o)      All records required under subdivision 372.2(c) were furnished upon request, or made available at a reasonable time for inspection - 372.2(c)(1)(iv). X
- (p)      There is written communication that the designated treatment, storage or disposal facility is authorized for the hazardous wastes being offered for shipment, has capacity to accept such hazardous waste, and will assure the ultimate disposal method is followed - 372.2(b)(2)(i). X
- (q)      There is written communication that the designated transporter is authorized to deliver the waste to the facility on the manifest - 372.2(b)(2)(ii). X

6. Preparedness and Prevention - 373-3.3

- (a)      The facility is maintained and operated to minimize the possibility of a fire or explosion, or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water - 373-3.3(b). X
- (b) X The facility must be equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below - 373-3.3(c):
- (1) X An internal communication or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel - 373-3.3(c)(1);
- (2) X A device, such as a telephone (immediately available at the scene of operations) or a hand-held, two-way radio capable of summoning emergency assistance from local police or fire departments or emergency response teams - 373-3.3(c)(2);
- (3)      Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment - 373-3.3(c)(3); and X



ACKNOWLEDGEMENT OF NOTIFICATION  
OF HAZARDOUS WASTE ACTIVITY  
(VERIFICATION)

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER

• NYD091576538

INSTALLATION ADDRESS

ULAND CORPORATION  
280 BERGEN ST  
BROOKLYN

NY 11217

280 BERGEN ST  
BROOKLYN

NY 11217

12/22/80

U.S. ENVIRONMENTAL PROTECTION AGENCY  
NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

INSTALLATION'S EPA I.D. NO.

I. NAME OF INSTALLATION

II. INSTALLATION MAILING ADDRESS

III. LOCATION OF INSTALLATION

PLEASE PLACE LABEL IN THIS SPACE

NYD091576538

**INSTRUCTIONS:** If you received a preprinted label, affix it in the space at left. If any of the information on the label is incorrect, draw a line through it and supply the correct information in the appropriate section below. If the label is complete and correct, leave Items I, II, and III below blank. If you did not receive a preprinted label, complete all items. "Installation" means a single site where hazardous waste is generated, treated, stored and/or disposed of, or a transporter's principal place of business. Please refer to the INSTRUCTIONS FOR FILING NOTIFICATION before completing this form. The information requested herein is required by law (Section 3010 of the Resource Conservation and Recovery Act).

## FOR OFFICIAL USE ONLY

## COMMENTS

INSTALLATION'S EPA I.D. NUMBER

APPROVED

DATE RECEIVED (yr., mo., &amp; day)

FNYD09157653821

801210

## I. NAME OF INSTALLATION

VLANO CORPORATION

## II. INSTALLATION MAILING ADDRESS

STREET OR P.O. BOX

3280 BERGEN ST

CITY OR TOWN

4 BROOKLYN

ST.

ZIP CODE

NY 11217

## III. LOCATION OF INSTALLATION

STREET OR ROUTE NUMBER

3280 BERGEN ST

CITY OR TOWN

6 BROOKLYN

ST.

ZIP CODE

NY 11217

## IV. INSTALLATION CONTACT

NAME AND TITLE (last, first, &amp; job title)

PHONE NO. (area code &amp; no.)

2 BORODKIN SOLOMON QC MANAGER

## V. OWNERSHIP

A. NAME OF INSTALLATION'S LEGAL OWNER

8 VLANO INDUSTRIES INC

B. TYPE OF OWNERSHIP (enter the appropriate letter into box)

VI. TYPE OF HAZARDOUS WASTE ACTIVITY (enter "X" in the appropriate box(es))

F - FEDERAL  
M - NON-FEDERAL

M

☒ A. GENERATION☒ B. TRANSPORTATION (complete item VII)☐ C. TREAT/STORE/DISPOSE☐ D. UNDERGROUND INJECTION

## VII. MODE OF TRANSPORTATION (transporters only - enter "X" in the appropriate box(es))

☐ A. AIR☐ B. RAIL☒ C. HIGHWAY☐ D. WATER☐ E. OTHER (specify):

## VIII. FIRST OR SUBSEQUENT NOTIFICATION

Mark "X" in the appropriate box to indicate whether this is your installation's first notification of hazardous waste activity or a subsequent notification. If this is not your first notification, enter your installation's EPA I.D. Number in the space provided below.

C. INSTALLATION'S EPA I.D. NO.

☒ A. FIRST NOTIFICATION☐ B. SUBSEQUENT NOTIFICATION (complete item C)

## IX. DESCRIPTION OF HAZARDOUS WASTES

Please go to the reverse of this form and provide the requested information.

WNYD09157653821

## IX. DESCRIPTION OF HAZARDOUS WASTES (continued from front)

A. HAZARDOUS WASTES FROM NON-SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.31 for each listed hazardous waste from non-specific sources your installation handles. Use additional sheets if necessary.

1	2	3	4	5	6
21 - 24	25 - 28	29 - 32	33 - 36	37 - 40	41 - 44
7	8	9	10	11	12
25 - 28	29 - 32	33 - 36	37 - 40	41 - 44	45 - 48

B. HAZARDOUS WASTES FROM SPECIFIC SOURCES. Enter the four-digit number from 40 CFR Part 261.32 for each listed hazardous waste from specific industrial sources your installation handles. Use additional sheets if necessary.

13	14	15	16	17	18
21 - 24	25 - 28	29 - 32	33 - 36	37 - 40	41 - 44
19	20	21	22	23	24
25 - 28	29 - 32	33 - 36	37 - 40	41 - 44	45 - 48
25	26	27	28	29	30
31 - 34	35 - 38	39 - 42	43 - 46	47 - 50	51 - 54

C. COMMERCIAL CHEMICAL PRODUCT HAZARDOUS WASTES. Enter the four-digit number from 40 CFR Part 261.33 for each chemical substance your installation handles which may be a hazardous waste. Use additional sheets if necessary.

31	32	33	34	35	36
21 - 24	25 - 28	29 - 32	33 - 36	37 - 40	41 - 44
U007	U112	U220			
25 - 28	29 - 32	33 - 36	37 - 40	41 - 44	45 - 48
U031	U154				
25 - 28	29 - 32	33 - 36	37 - 40	41 - 44	45 - 48
U069	U159				
25 - 28	29 - 32	33 - 36	37 - 40	41 - 44	45 - 48

D. LISTED INFECTIOUS WASTES. Enter the four-digit number from 40 CFR Part 261.34 for each listed hazardous waste from hospitals, veterinary hospitals, medical and research laboratories your installation handles. Use additional sheets if necessary.

49	50	51	52	53	54
21 - 24	25 - 28	29 - 32	33 - 36	37 - 40	41 - 44
25 - 28	29 - 32	33 - 36	37 - 40	41 - 44	45 - 48

E. CHARACTERISTICS OF NON-LISTED HAZARDOUS WASTES. Mark "X" in the boxes corresponding to the characteristics of non-listed hazardous wastes your installation handles. (See 40 CFR Parts 261.21 - 261.24.)

☐ 1. IGNITABLE  
(D001)☐ 2. CORROSIVE  
(D002)☐ 3. REACTIVE  
(D003)☐ 4. TOXIC  
(D004)

## X. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

SIGNATURE

NAME &amp; OFFICIAL TITLE (type or print)

DATE SIGNED

Solomon Borodkin

Solomon Borodkin  
Quality Control Manager

12/5/80



## ACKNOWLEDGEMENT OF NOTIFICATION OF HAZARDOUS WASTE ACTIVITY

05/10/93

This is to acknowledge that you have filed a Notification of Hazardous Waste Activity for the installation located at the address shown in the box below to comply with Section 3010 of the Resource Conservation and Recovery Act (RCRA). Your EPA Identification Number for that installation appears in the box below. The EPA Identification Number must be included on all shipping manifests for transporting hazardous wastes; on all Annual Reports that generators of hazardous waste, and owners and operators of hazardous waste treatment, storage and disposal facilities must file with EPA; on all applications for a Federal Hazardous Waste Permit; and other hazardous waste management reports and documents required under Subtitle C of RCRA.

EPA I.D. NUMBER -> NYD091576538

FACILITY NAME -> ULANO CORP

MAILING ADDRESS -> 255 BUTLER ST  
BROOKLYN, NY 11217

INSTALLATION ADDRESS -> 280 BERGEN ST  
BROOKLYN, NY 11217

EPA Form 8700-12AB (4-80)

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION II  
26 FEDERAL PLAZA  
NEW YORK, NEW YORK 10278

ATTN: AIR & WASTE MANAGEMENT DIVISION, ROOM 1006  
HAZARDOUS & SOLID WASTE PROGRAMS BRANCH  
RCRA NOTIFICATIONS

TO: LEE, JOHN  
PLANT MGR  
ULANO CORP  
255 BUTLER ST  
BROOKLYN, NY 11217



255 Butler Street,  
Brooklyn, New York 11217

Telephone: (718) 622-5200  
Telex: 421 390 DFMC U  
Fax: (718) 802-1119

Regional Offices in Chicago, Houston,  
Los Angeles and Abroad

ENVIRONMENTAL PROTECTION  
AGENCY REGION II

93 APR -9 AM 11:41

March 31, 1993  
HAZARDOUS WASTE  
PROGRAMS BRANCH

Mr. Stanley Siegel  
Chief of Hazardous & Solid Waste  
Program Branch  
(2AWM-HSWP)  
U.S. EPA - Region II  
26 Federal Plaza  
New York, NY 10278

Dear Mr. Siegel:

This is to notify you that Ulano Corporation's status has changed from a Large Quantity Generator of Hazardous Waste under the Resource Conservation and Recovery Act (RCRA) to a Small Quantity Generator at the following two locations, effective January 1, 1993:

280 Bergen Street, Brooklyn, N.Y. 11217 EPA ID NYD 091 576 538  
601 Bergen Street, Brooklyn, N.Y. 11238 EPA ID NYD 001 725 878

Attached are EPA Forms 8700-12, Notification of Regulated Waste Activity for each of the above locations. Ulano Corporation has made a good faith effort to minimize its waste generation and has selected the best waste management method that is available.

If you require any additional information, please do not hesitate to contact me.

Yours truly,

*Max A. Cohen*

Max A. Cohen  
Safety & Environmental Compliance

MAC/Ig  
Encl.  
cc: A. Willenbrock, Ulano  
J. Lee, Ulano

— **1997** —

[The form contains multiple sections with various fields, many of which are redacted with black boxes. The visible text includes:]

Section 1: [Redacted]

Section 2: [Redacted]

Section 3: [Redacted]

Section 4: [Redacted]

Section 5: [Redacted]

Section 6: [Redacted]

Section 7: [Redacted]

Section 8: [Redacted]

Section 9: [Redacted]

Section 10: [Redacted]

Section 11: [Redacted]

Section 12: [Redacted]

Section 13: [Redacted]

Section 14: [Redacted]

Section 15: [Redacted]

Section 16: [Redacted]

Section 17: [Redacted]

Section 18: [Redacted]

Section 19: [Redacted]

Section 20: [Redacted]

Section 21: [Redacted]

Section 22: [Redacted]

Section 23: [Redacted]

Section 24: [Redacted]

Section 25: [Redacted]

Section 26: [Redacted]

Section 27: [Redacted]

Section 28: [Redacted]

Section 29: [Redacted]

Section 30: [Redacted]

Section 31: [Redacted]

Section 32: [Redacted]

Section 33: [Redacted]

Section 34: [Redacted]

Section 35: [Redacted]

Section 36: [Redacted]

Section 37: [Redacted]

Section 38: [Redacted]

Section 39: [Redacted]

Section 40: [Redacted]

Section 41: [Redacted]

Section 42: [Redacted]

Section 43: [Redacted]

Section 44: [Redacted]

Section 45: [Redacted]

Section 46: [Redacted]

Section 47: [Redacted]

Section 48: [Redacted]

Section 49: [Redacted]

Section 50: [Redacted]

Section 51: [Redacted]

Section 52: [Redacted]

Section 53: [Redacted]

Section 54: [Redacted]

Section 55: [Redacted]

Section 56: [Redacted]

Section 57: [Redacted]

Section 58: [Redacted]

Section 59: [Redacted]

Section 60: [Redacted]

Section 61: [Redacted]

Section 62: [Redacted]

Section 63: [Redacted]

Section 64: [Redacted]

Section 65: [Redacted]

Section 66: [Redacted]

Section 67: [Redacted]

Section 68: [Redacted]

Section 69: [Redacted]

Section 70: [Redacted]

Section 71: [Redacted]

Section 72: [Redacted]

Section 73: [Redacted]

Section 74: [Redacted]

Section 75: [Redacted]

Section 76: [Redacted]

Section 77: [Redacted]

Section 78: [Redacted]

Section 79: [Redacted]

Section 80: [Redacted]

Section 81: [Redacted]

Section 82: [Redacted]

Section 83: [Redacted]

Section 84: [Redacted]

Section 85: [Redacted]

Section 86: [Redacted]

Section 87: [Redacted]

Section 88: [Redacted]

Section 89: [Redacted]

Section 90: [Redacted]

Section 91: [Redacted]

Section 92: [Redacted]

Section 93: [Redacted]

Section 94: [Redacted]

Section 95: [Redacted]

Section 96: [Redacted]

Section 97: [Redacted]

Section 98: [Redacted]

Section 99: [Redacted]

Section 100: [Redacted]



a copy was made and for the  
Berma Manu. file.

~~J. Inspection~~

RCRA GENERATOR INSPECTION FORM

COMPANY NAME:

ULLANO Corporation

Berma Manufacturing Co.

COMPANY ADDRESS:

ULLANO Corp. - 280 Bergen St., Brooklyn

Berma - 401 Bergen St., Brooklyn

COMPANY CONTACT OR OFFICIAL:

Mr. Brodtkin - Quality Control Director  
622-5200

TITLE:

Dr. Robert Gold, V.P. Research & Development

CHECK IF FACILITY IS ALSO A TSD  
FACILITY ☐ YES ☒ NO

EPA I.D. NUMBER:

NYD 0915 765 38

NYD 0017 258 78

INSPECTOR'S NAME:

ANNA SARACCO

BRANCH/ORGANIZATION:

NYS Dept. of Environmental Conservation  
Region 2

DATE OF INSPECTION:

August 4, 1981 Afternoon

YES NO DCI FCI

(1) Is there reason to believe that the facility has hazardous waste on site? ☒

a. If yes, what leads you to believe it is hazardous waste?  
Check appropriate box:

☒ Company admits that its waste is hazardous during the inspection.

☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.

☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)

☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)

☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)

☐ EPA testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)

☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)

RECEIVED  
OCT 27 10 14 AM '81  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10001

YES

NO

DON'T  
KNOW

- b. Is there reason to believe that there are hazardous wastes on-site which the company claims are merely products or raw materials?

Please explain:

*Answer: MEK  
in drums & c.  
contain mixture of  
toluene  
Butanol  
Ethyl acetate  
Butyl acetate  
1-butyl phthalate  
according to  
manifests.*

- c. Identify the hazardous wastes that are on-site, and estimate approximate quantities of each.

*There are approximately 66 drums of waste solvents, mostly MEK according to Mr. Borodkin. They have an underground storage tank containing about having a 4000 gallon capacity that was almost full.*

- d. Describe the activities that result in the generation of hazardous waste. The company manufactures aqueous and solvent coatings for the graphic arts industry. The solvents from cleaning the machines generates the waste, mostly MEK with some other solvents. The deformed waste has alcohol.

- (2) Is hazardous waste stored on site?

- a. What is the longest period that it has been accumulated?

*The waste is stored at 601 Bergen for about three weeks.*

- b. Is the date when drums were placed in storage marked on each drum?

*At 608 Bergen ~~one~~ 4 drums a day are brought to 601 Bergen for storage. The remaining waste is generated at Bergen at 601 Bergen.*

- (3) Has hazardous waste been shipped from this facility since November 19, 1980?

- a. If "yes," approximately how many shipments were made?

*15 shipments according to Mr. Borodkin's manifests.*

- (4) Approximately how many hazardous waste shipments off site have been made since November 19, 1980?

- a. Does it appear from the available information that there is a manifest copy available for each hazardous waste shipment that has been made?

*I saw records since Dec. 1980. Manifest for all shipments.*

- b. If "no" or "don't know," please elaborate.

YESNODON'T  
KNOW

c. Does each manifest (or a representative sample) have the following information?

- a manifest document number ✓
- the generator's name, mailing address, telephone number, and EPA identification number ✓
- the name, and EPA identification number of each transporter ✓
- the name, address and EPA identification number of the designated facility and an alternate facility, if any: ✓
- a description of the wastes (DOT) ✓
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle ✓
- a certification that the materials are properly classified, described, packaged, marked, and labeled, and are in proper condition for transportation under regulations of the Department of Transportation and the EPA ✓

(5) Were there any hazardous wastes stored on site at the time of the inspection?

- a. If "yes," do they appear properly packaged (if in containers) or, if in tanks, are the tanks secure? ✓

*There is just two tanks to pump out for tanks with caps on them to pump out of. It is only 3 yrs. old & built according to N.Y.C. rules.*

- b. If not properly packaged or in secure tanks, please explain.

c. Are containers clearly marked and labelled?

*Each drum has a yellow sticker with all the necessary information.*

d. Do any containers appear to be leaking?

e. If "yes," approximately how many?

*Waste Manifest signed, N.D.S.  
Generator Name & address  
Date of Accumulation:*

*These drums & the underground tank are pumped out. The drums are not removed.*

Note: They registered as a transporter. They only transport about 4 drums a day between 280 Bergen & 601 Bergen, about 1/2 mile. They use an internal manifest for this. He will be advised that he needs a NYS DEC Part 364 Permit to do this.

"(6) Has the generator submitted an annual report to EPA covering the previous calendar year?

a. How do you know?

Not applicable.

(7) Has the generator received signed copies (from the TSD facility) of all manifests for wastes shipped off site more than 35 days ago?

a. If "no," have Exception Reports been submitted to EPA covering these shipments?

(8) General comments. This company ~~got~~ applied for two generator #s.

They now use ~~Berman~~ <sup>Uran</sup> on their manifests. At 280 Bergen, Uran generates about 4 drums a day and the drums are labelled immediately. They transport about twice a day to Berman at 601 Bergen, where they have a storage yard. <sup>The remaining waste is generated from Berman at 601 Bergen. There are two different names & locations by the same company. They will not be as Berman as a generator on their manifest.</sup> About 5,000 gallons ~~are~~ is shipped out about once every two weeks. They have shipped 52,670 gallons since 12/80.

For three shipments the waste was brought to Hazardous Waste Disposal & Applied Technology in Long Island. They shipped 5 shipments of 39 drums each to Continental Technical Finishers (Technonics), Brooklyn. Now they use Applied Technology (P.O. Box 46, Friedersburg, PA 17933, 25 South Shore Drive, Tom River, N.J.) also called LTK.

Applied Technology brings it to All County in N.J.; Dupont in Deepwater, N.J.; <sup>Portland Cement Co.</sup> Keystone (P.O. #3 Bath, Penn. 18014).

Note: Uran generates a couple of drums per week of aqueous waste with 2% di-butyl phthalate. This had in the recent past been removed the same as the solvents by industrial hauler.

They now use Consumer Rubbish Removal a garbage regular garbage collector for this waste.



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

RCRA TRANSPORTER INSPECTION CHECKLIST

Transporter Name: UIANO Corporation  
Transporter Address: 280 Bergen Street  
Brooklyn, NY

EPA I.D.: NYD 0915 765 38

Driver: Did not stop truck

- |   | <u>Yes</u>                              | <u>No</u> |
|---|---|-----------|
| 1. Does the transporter have an EPA I.D. number?          | ( <input checked="" type="checkbox"/> ) | ( )       |
| 2. Is the transporter carrying hazardous waste?           | ( )                                     | ( )       |
| 3. Does the transporter have a manifest?                  | ( )                                     | ( )       |
| 4. Does the manifest show the following information:      |   |           |
| a. Name, address, I.D. of generator                       | ( )                                     | ( )       |
| b. Name, address, I.D. of transporter                     | ( )                                     | ( )       |
| c. Name, address, I.D. of designated facility             | ( )                                     | ( )       |
| d. Name of alternative facility                           | ( )                                     | ( )       |
| e. DOT waste description                                  | ( )                                     | ( )       |
| f. Quantity of waste-volume, weight, number of containers | ( )                                     | ( )       |
| g. Signed certification statement                         | ( )                                     | ( )       |
| 5. Does the manifest information confirm vehicle load?    | ( )                                     | ( )       |
| 6. Is the vehicle placarded for hazardous waste?          | ( )                                     | ( )       |

## 7. General comments:

The company has two manufacturing facilities about 1/2 mile apart. At the 280 Bergen Street address about 4 drums of waste solvents are generated per day. They use their own trucks to transport these drums to their storage yard + others plant called Berman at 601 Bergen Street. They do not manifest these shipments. They transport about

Inspected by: Gino Saracco

Date: August 4, 1981

twice a day between

280 Bergen + 601 Bergen. Page 1 of 1 An industrial waste hauler is called to dispose of the drums at 601 Bergen.



255 BUTLER STREET, BROOKLYN, N.Y. 11217

(212) 622-5200

CABLE: ULANOFILM, NY

June 8, 1983

ED 304  
JH  
MADONAS  
7/1/83

Dr. Ernest A. Regna, Chief  
Solid Waste Branch  
Environmental Protection Agency  
Solid Waste Branch  
Air and Waste Management Division  
26 Federal Plaza  
New York, N.Y. 10278

Re: EPA ID# 091576538

Dear Dr. Regna:

I am writing this letter in response to your communication of May 26, 1983 regarding the inspection of our premises at 280 Bergen St. on 12/21/82.

With reference to the first point relating to Sec. 262.34(6)(4). This point was addressed in my response to you on 3/15/83 regarding the inspection report of our premises at 601 Bergen St.

Since that time however, all procedures have been reduced to writing, formal instruction given to all personnel handling hazardous waste and a record keeping system detailing individual responsibilities of all workers and the training received relating to hazardous waste handling instituted.

The three points relating to Sec. 262.32(b)262.32(a)(2) and 262.34(a)(3) taken together all deal with 2 drums of waste material on the sidewalk that possibly contained hazardous waste.

Unfortunately this inspection occurred prior to the completion of the new extension to 280 Bergen St. At that time, due to the construction, the sidewalk in front of the building was used for a staging and a temporary storage area. This was necessary due to restrictions imposed by our insurance carrier on the number of flammable containers permitted in the building at one time.

JUN 21 10 29 AM '83  
ENVIRONMENTAL AGENCY  
NEW YORK, N.Y. 10001  
RECEIVED

Since then however, the construction has been completed and we now have available to us a fireproof lacquer vault for the storage of flammables. No hazardous waste is transferred from 280 Bergen St. to 601 Bergen. All hazardous waste generated at 280 Bergen remains in the lacquer vault until transported by licensed carrier to the disposal facility accompanied with a New York State manifest.

The use of the lacquer vault for the storage of hazardous waste permits us to carefully inspect each drum for leaks or damages and examine the labels for conformance with 40 CFR Sec. 262.32(b).

Sincerely,

ULANO CORPORATION



Solomon Borodkin, Director  
Quality Control Department

SB/1g

cc: Richard A. Baker , U.S. Environmental Protection Agency,  
Region II

James Reid  
N.Y. S. Department of Environmental Conservation

FEB 17 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Solomon Borodkin  
Director of Quality Control  
Ulane Corporation  
610 Dean Street  
Brooklyn, New York 11238

Re: Ulane Corporation  
EPA Identification Number: NYDC01725087  
Facility located At : 601 Bergen Street, Brooklyn, New York  
Inspection Performed On : December 21, 1982

Dear Mr. Borodkin:

The Environmental Protection Agency (EPA) is charged with the responsibility for implementing the Solid Waste Disposal Act, as amended, 42 U.S.C. 46901 et seq. (the Act). [Note: Among the statutes amending the Act is the Resource Conservation and Recovery Act (RCRA), 90 Stat. 2795, P.L. 94-580 (1976).] By notification, you informed EPA that you conduct activities at the above referenced facility involving "hazardous waste," as that term is defined in Section 1004(5) of the Act, 42 U.S.C. 46904(5), and in 40 CFR 261.

In accordance with EPA's responsibility, an inspection was performed at this facility by a duly authorized representative of EPA pursuant to Section 3007 of the Act. This above referenced inspection revealed that your facility was acting as a generator by producing hazardous waste and was being used for the storage of hazardous waste.

40 CFR Part 262 establishes standards for generators and 40 CFR Part 265 sets interim status standards for treatment, storage and disposal facilities that handle hazardous wastes. These interim status standards apply until final administrative disposition of the permit application submitted by the owner and operator of the facility has been made. As required in Section 3005 of the Act, 42 U.S.C. 46925, and in 40 CFR 262, you failed to request a permit to conduct such hazardous waste activities.

*Letter received  
+resent -  
Please remove  
previous letter in  
file dated  
2/11/83*

*FAD*



The inspection revealed that your facility was in violation of certain provisions of Part 262 and Part 265. On the basis of these findings, the Solid Waste Branch Chief of Region II has determined that your facility is operating in violation of Section 3002 and Section 3003 of the Act, 42 U.S.C. §6922 and §6925 and the regulations promulgated thereunder. The following paragraphs indicate the regulatory provisions that have been violated.

40 CFR §122.21 requires a hazardous waste management facility to obtain a permit for the treatment, storage and disposal of hazardous waste. At the time of the inspection, wastes stored at the 601 Bergen Street facility included hazardous wastes from off-site sources, i.e., 280 Bergen Street, therefore the 601 Bergen Street facility does not qualify for the permit exemption under 40 CFR §262.34 for generators accumulating hazardous waste on-site. You were therefore in violation of 40 CFR §122.21.

40 CFR §262.34(a) allows a generator to accumulate hazardous waste in containers and tanks for a period of no more than 90 days provided the accumulation conforms to certain regulations. At the time of the inspection, it was revealed that your facility did not meet the requirements of:

40 CFR §262.34(a)(1) which requires a generator to comply with the requirements in 40 CFR 265 Subparts I (Containers) and J (Tanks). At the time of the inspection, containers and tanks were observed which failed to comply fully with those Subparts. You were therefore in violation of 40 CFR §262.34(a)(1).

40 CFR §262.34(a)(4) which requires a generator to comply with the requirements in 40 CFR 265 Subpart C (Preparedness and Prevention) and 40 CFR 265 Subpart D (Contingency Plan and Emergency Procedures) and with §265.16 (Personnel Training). You were therefore in violation of 40 CFR §262.34(a)(4).

Section 3008 of the Act authorizes the assessment of a civil penalty of up to \$25,000 per day for violations of statutory provisions or relevant regulations. The determination of whether a penalty is to be imposed is based upon the nature and seriousness of the violation and the good faith efforts to comply with the applicable requirements. It has been determined in this case that no penalty will be imposed for the violations cited above if the facility corrects all violations cited herein as expeditiously as possible and in no case later than sixty (60) days from the receipt of this letter. Should the cited violations be discovered at this facility during future inspections, it is likely that an action for the assessment of a civil penalty will be initiated. Furthermore, please be advised that this letter in no way precludes future enforcement actions for any other violations discovered as a result of any other inspection.

Please confirm in writing within sixty (60) days of your receipt of this letter that the above referenced violations have been corrected. This confirmation should be addressed to the Environmental Protection Agency, Solid Waste Branch, Air and Waste Management Division, 26 Federal Plaza, New York, New York 10278. Also, please send a copy of this confirmation to Mr. Thomas Taccone, Permits Administration Branch, at the same address. You must include your EPA identification number in any correspondence. Should you have questions about this notice or should you wish to discuss this matter further, please contact Ms. Janet DeBlasio of my staff at (212) 264-1823.

A copy of the inspection report is enclosed.

Sincerely yours,

Ernest A. Regua  
Chief  
Solid Waste Branch

~~Enclosure~~

cc: David Maffici  
Chief, Bureau of Hazardous Waste  
Operations, DEC (w/o Encl.)  
bcc: J. DeBlasio, SWB  
T. Taccone, PAB ✓  
J. Reid, DEC Region 2  
E. Shannon, SWB

MAY 25 1983

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Solomon Brodwin  
Quality Control Director  
Ulaco Corporation  
240 Bergen Street  
Brooklyn, NY 11217

EPA Identification Number EYD00157650A  
Facility Location Same  
Inspection Date December 21, 1982  
30 564 10107

Dear Mr. Brodwin:

The Environmental Protection Agency (EPA) is charged with the responsibility of implementing the Solid Waste Disposal Act, as amended, 42 U.S.C. 6901 et seq. (the Act). [Among the statutes amending the Act is the Resource Conservation and Recovery Act (RCRA), 90 Stat. 2795, P.L. 94-596 (1974).] By notification, you informed EPA that you conduct activities at the above referenced facility involving "hazardous waste," as that term is defined in Section 1004(3) of the Act, 42 U.S.C. 6904(3), and in 40 CFR 261.

In accordance with EPA's responsibility, an inspection was performed at this facility by a duly authorized representative of EPA pursuant to Section 3007 of the Act. This above referenced inspection revealed that your facility was acting as a generator by producing hazardous waste.

40 CFR Part 261.13 establishes standards for generators who accumulate hazardous waste on site for 90 days or less. This section of Part 261 incorporates by reference 40 CFR 261.16 and Subparts C, D, E, and F of 40 CFR Part 261.

The inspection revealed that your facility was in violation of one or more of these subparts. On the basis of these findings, the United States Waste Branch, Region II, has determined that your facility is operating in violation of Section 3007 of the Act, 42 U.S.C. 6907, and the regulations promulgated thereunder. The following paragraphs indicate the regulatory provisions that have been violated.

4. 40 CFR 262.12(f) states that a generator must have each container of 110 gallons or less that will be transported off-site with the words required in 40 CFR 262.12(f). At the time of the inspection, such containers of hazardous waste were not marked in compliance with this regulation. You were therefore in violation of 40 CFR 262.12(f).

\* 40 CFR §262.34(a) allows a generator to accumulate hazardous waste in containers and tanks for a period of no more than 90 days provided the accumulation conforms to certain regulations. At the time of the inspection, it was revealed that your facility did not meet the requirements of:

- " 40 CFR §262.34(a)(2) which requires the date upon which each person of accumulation begins to be clearly marked and visible for inspection on each container. You were therefore in violation of 40 CFR §262.34(a)(2).
- " 40 CFR §262.34(a)(3) which requires each container or tank accumulating hazardous waste to be marked or labeled clearly with the words, "Hazardous Waste." You were therefore in violation of 40 CFR §262.34(a)(3).
- " 40 CFR §262.34(a)(4) which requires a generator to comply with the requirements in 40 CFR 265 Subpart C (Preparedness and Prevention) and 40 CFR 265 Subpart E (Contingency Plan and Emergency Procedures) and with §265.17 (Personnel Training). You were therefore in violation of 40 CFR §262.34(a)(4).

Section 309(a) of the Act authorizes the assessment of a civil penalty of up to \$25,000 per day for violations of statutory provisions or relevant regulations. The determination of whether a penalty is to be imposed is based upon the nature and seriousness of the violation and the good faith efforts to comply with the applicable requirements. It has been determined in this case that no penalty will be imposed for the violations cited above if the facility corrects all violations cited herein as expeditiously as possible and in no case later than thirty (30) days from the receipt of this letter. Should the cited violations be discovered at this facility during future inspections, it is likely that an action for the assessment of a civil penalty will be initiated. Furthermore, please be advised that this letter in no way precludes future enforcement actions for any other violations discovered as a result of any other inspection.

Please confirm in writing within thirty (30) days of your receipt of this letter that the above referenced violations have been corrected and include supporting documentation as appropriate. This confirmation should be addressed to:

Walter A. Kopas  
Chief, Solid Waste Branch  
Air and Waste Management Division  
U. S. Environmental Protection Agency, Region II  
16 Federal Plaza  
New York, NY 10027

with copies to

Richard A. Baker  
Chief, Permit Administration Branch  
U. S. Environmental Protection Agency, Region II  
26 Federal Plaza  
New York, NY 10275

and

James Reid  
Regional Solid Waste Engineer, Region 2  
New York State Department of Environmental Conservation  
2 World Trade Center  
61st Floor  
New York, NY 10047

You must include your EPA identification number on all correspondence.

Should you have questions about this Notice or should you wish to discuss this matter further, please contact Janet DeBiasio or my staff at (212) 264-1623. A copy of the inspection report is enclosed.

Sincerely yours,

Ernest A. Regan  
Chief  
Solid Waste Branch

Enclosure

cc: David Marriot, Chief,  
Bureau of Hazardous Waste Operations, NYSDOC, w/o encl.

James Reid  
Regional Solid Waste Engineer, Region 2, NYSDOC, w/o encl.

bcc: Janet DeBiasio, 2AWM-SW w/encl.  
Richard A. Baker, 2PM-PA w/o encl. ✓

## RCRA INSPECTION FORM

2  
JAN 14 1989  
ENVIRONMENTAL PROTECTION  
AGENCY  
NEW YORK, N.Y. 10007

Report Prepared for:

Generator ☒Transporter ☒HWM (TSR) facility ☐Copy of report sent to the facility ☐

14  
Access # -  
6100-00 (Kings)

EPA # 5801-03

## Facility Information

Name: ULANO CORPORATIONAddress: 280 Bergen Street  
BROOKLYN, NY 11217EPA ID#: NYD 0915 76538Date of Inspection: December 21, 1982

## Participating Personnel

State or EPA Personnel: ANNA SARACLONYSDERFacility Personnel: SOLOMON BORODKIN  
Quality Control DirectorReport Prepared by Name: ANNA SARACLOAgency: NYSDER, Region 2Telephone #: 212-488-3862

Approved for the Director by:

James Lind

HAZARDOUS  
DIVISION

OF  
OPERATIONS  
AND WASTE

Summary of Findings

Facility Description and Operations

This company manufactures coating lacquers for what is called masking films. The lacquer is made of nitrocellulose, solvents, and various plasticizers. The lacquers are made in vats at their 601 Bergen Street location. The lacquers are then rolled onto polyester sheets. This is done at the 280 Bergen Street location.

The lacquers are made of nitrocellulose, solvents and various plasticizers. Solvents contained in the lacquer are toluene, ethyl acetate, isobutyl alcohol, isobutyl acetate. Ullman generates approximately 5,200 gallons/month of hazardous wastes. This is a total of the hazardous wastes generated from both 280 Bergen + 601 Bergen Streets. The majority of this is their MEK wastes. In 1982 they generated 63,479 gallons of hazardous waste from 601 + 280 Bergen, combined. This was divided by twelve to get the average 5,290/month. However in June there were no shipments of wastes, so that in fact they generate slightly more per month.

The MEK waste is generated from cleaning the vats at 601 Bergen and the <sup>coating</sup> rollers for the coating machines at 280 Bergen.

Summary of FindingsFacility Description and Operations

The <sup>MEL</sup> waste consists of between 50-70% MEK and some toluene, butanol, ethyl acetate, isobutyl alcohol and isobutyl acetate. Mr. Borodkin showed me two analyses of the waste.

MEK	77%	50%
Ethanol	10%	
Toluene	9%	31%
Ethyl acetate	20%	
Isopropyl alcohol		21%

From 280 Bergen Street, approximately 1,500 gallons per month of hazardous waste is generated. This consists of:

MEK Waste - that is generated from the cleaning the machines that coat the lacquer onto the polyester. 1,350 gallons.

Isopropyl Alcohol - this is used to clean a machine that puts a photographic top coat on film. This coating is put on so that when the film is rolled no marks or scratches are made. It is also used to clean a machine that puts an anti-static on the film. Mr. Borodkin says that only about 150 gallons of this is generated per month.



Summary of Findings

Facility Description and Operations

In addition two types of non-hazardous wastes are generated from 280 Bergen Street.

Polyvinyl alcohol waste: The PVA is used to make a direct film. The material is made of PVA with different plasticizers and fillers. It consists mainly of polyvinyl alcohol, polyvinyl acetate, dibutyl phthalate. The waste consists of approximately 20% water, 7% Polyvinyl alcohol, 22% Polyvinyl acetate, 1% dibutyl phthalate, according to an analysis sent to NYDEC, region 2, Sept. 25, 1981. Water is used to clean the PVA out of the kettles it is made in. Approximately 10 drums/month is generated from 280 Bergen Street.

Gelatin Waste: - They make a gelatin film. The machine that it is made in is ~~washed~~ washed with water. The resultant waste consists of 82% water, 5% sorbitol, 3% iron salts, 10% gelatin according to their Sept. 81 letter to us. They generate about 10 drums/month of this from 280 Bergen Street.

Summary of FindingsFacility Description and Operations

All of this waste is shipped from 280 Bays to 601 Bays daily. At 601 Bays there is an outside storage yard and an underground tank. The hazardous waste is labelled Waste Flammable Liquid and dated from its point of generation. Internal manifests are kept describing the waste shipped, name of generator, etc. A log book is also kept describing what is shipped, quantity, etc. from 280 Bays to 601 Bays. The drums that are generated at 280 Bays are stored outside on the sidewalk until they are shipped. Regular shipments are made, approximately two per day to 601 Bays. From 601 Bays regular shipments are made. They have been using Delaware Containers, Greenville, PA to pick-up both their hazardous wastes and non-hazardous wastes.

They cannot store flammables currently at 280 Bays because of Fire Dept. rules. However they are expanding their building & will be able to store at 280 Bays. Then not as many shipments would be made between locations. Also Mr. Broadkin indicated they plan to cut production of the MEK product, therefore the wastes would be reduced.

There are some waste solvents generated from the laboratory. These solvents are put in with the MEK solvent drums.

Describe the activities that result in the generation of hazardous waste.

See page A.

Identify the hazardous waste located on site, and estimate the approximate quantities of each. (Identify Waste Codes)

At 280 Berger Street there were 2 drums of  
~~oil~~ waste. This is stored outside the plant awaiting  
pick-up. These two drums did not have the yellow hazardous waste  
sticker. Mr. Bandkin said that he thought they were the waste oil.  
They had a colored sticker across the top that said "oil".  
However, it was not clear to me what was in these drums.

There was another drum inside the plant in the  
process of being filled with the MEX waste.  
This had the ~~usual~~ yellow hazardous waste label on it, indicating  
waste flammable liquid, etc.

Is there reason to believe that the facility has hazardous waste on-site?

- a. If yes, what leads you to believe it is hazardous waste?  
Check appropriate boxes:

- ☒ Company admits that its waste is hazardous during the inspection.
- ☒ Company admitted the waste is hazardous in its RCRA notification and/or Part A Permit Application.
- ☐ The waste material is listed in the regulations as a hazardous waste from a nonspecific source (§261.31)
- ☐ The waste material is listed in the regulations as a hazardous waste from a specific source (§261.32)
- ☐ The material or product is listed in the regulations as a discarded commercial chemical product (§261.33)
- ☐ Testing has shown characteristics of ignitability, corrosivity, reactivity or extraction procedure toxicity, or has revealed hazardous constituents (please attach analysis report)
- ☐ Company is unsure but there is reason to believe that waste materials are hazardous. (Explain)
-

# Transporter Inspection Report Form

## 40 CFR Part 263 Transporter Standards

	YES	NO	N/A
263.10 - Does the transporter carry hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
263.12 - Does the transporter store hazardous waste at a transfer facility - If yes, how long? <div style="margin-left: 20px;"> <input type="checkbox"/> 30 days or less  <input type="checkbox"/> more than 10 days (complete TSD form)         </div>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
263.20 - Manifest System			
1) Does the transporter have a copy for each manifest shipment of hazardous waste?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2) Does a representative portion of the manifests show the following information (if no, circle the missing information)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
o Generator's name, address, telephone and EPA I.D. numbers, signature and date of signature	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
o Transporter's name, EPA I.D. number, signature and date of signature	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
o TSD's name, address and EPA I.D. Number	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
and either the signature and date of the TSD or the name, EPA I.D., signature and date of the next transporter.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
o Manifest Document number	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
o Proper DOT shipping description	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
o Quantity & type of containers	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
(If no, to any of the above obtain copies of incomplete manifests).			
3) Based on available information, do all manifests conform to the hazardous waste shipments made? If no, explain	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
263.22 - Have records been kept since November 19, 1980?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
263.30 - Has there ever been a spill or discharge of hazardous waste during transportation?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
If yes, was the incident report submitted to DOT? (obtain copy of the report)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
263.31 - If there was any spill or discharge of hazardous waste, was it cleaned up? If no, explain.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## General Comments:

Drummed MEL waste and isopropyl alcohol waste is shipped from 200 Bergen to 601 Bergen for storage. An internal manifest is kept for these transfers. No H.Y.S. manifest is used for these transfers between facilities. Also non-hazardous PVA waste and gelatin waste is shipped from 200 Bergen to 601 Bergen.

## GENERATOR INSPECTION CHECKLIST

40 CFR 262 Subpart A-General

YES NO N/A

262.11 - Hazardous Waste Determination

- 1) Did the generator test its waste to determine whether it is hazardous?  
Is the waste hazardous?
- 2) Is the generator determining that its waste exhibits a hazardous waste characteristic(s) based on its knowledge of the material(s) or processes used?

X — —  
X — —  
X — —

40 CFR 262 Subpart B-The Manifest

Has hazardous waste been shipped off-site since November 19, 1980?

X — —

If yes, approximately how many shipments, off-site, have been made and describe the approximate size of an average shipment made on a monthly basis. If facility is a small quantity generator, please explain. *From 280 Bayou approx. 2-3 drums/day of M&EK & alcohol waste is shipped to 601 Bayou Street for storage.*

262.21 Does each manifest (or representative sample) have the following information? Please circle the missing elements.

- a manifest document number?
- the generator's name, mailing address, telephone number and EPA I.D. Number?
- the transporter's name and EPA I.D. Number?
- the name, address and EPA ID Number of the designated facility?
- a description of the wastes (DOT)?
- the total quantity of each hazardous waste by units of weight or volume, and the type and number of containers as loaded into or onto the transport vehicle?
- a certification that the materials are properly classified, described, packaged, marked and labeled, and are in proper condition for transportation under regulations of the DOT and EPA?

X — —  
X — —  
— — —  
X — —  
X — —  
X — —  
X — —

(obtain a copy of the incomplete manifests)

40 CFR 262 - Subpart D - Recordkeeping and Reporting

262.40 Has the generator maintained facility records since Nov. 19, 1980? (manifest, exception report and waste analysis)

X — —

262.42 Has the generator received signed copies (from the TSD facility) of all the manifests for waste shipped off-site more than 33 days ago?

— — X

If not, have Exception Reports been submitted to EPA covering any of these shipments made more than 45 days ago?

— — —

40 CFR 262 - Subpart C - Pretransportation Requirements

YES NO N/A  
1

262.10-13 Before transporting or offering hazardous waste for transportation off-site does the generator:

- 1) Package the waste in accordance with applicable DOT regulations (i.e., 49 CFR Parts 173, 178 & 179) X
- 2) Label each package according to DOT (i.e., 49 CFR 172) X
- 3) Mark each package according to DOT (i.e., 49 CFR 172) X
- 4) Mark each container of 110 gallons or less with the words "Hazardous Waste - Federal Law Prohibits Improper Disposal. If found, contact the nearest police or public safety authority or the U.S. EPA," and include the generator's name, address and manifest document number. (i.e., 49 CFR 172.304) X

262.34 Accumulation Time *These were two drums outside the building that did not have yellow stripes, Mr. Borodkin indicated who alcohol work.*

1) How is waste accumulated on-site?

- ☒ Containers
- ☐ Tanks
- ☐ Surface impoundments (complete BRF checklist)
- ☐ Piles (complete BRF checklist)

2) Is waste accumulated for more than 90 days?

If yes, complete BRF checklist

3) Is each container clearly dated with each period of accumulation so as to be visible for inspection?

4) Is each container or tank marked or labeled with the words "hazardous waste" or in compliance with the DOT Labeling requirements?

X

X } Two drums outside

X } did not have labels.

*Mr. Borodkin*

STOP HERE IF THE HAZARDOUS WASTE MGT FACILITY (TSD) CHECKLIST IS FILLED OUT *thought they were improperly alcohol waste.*

262.34 - SECRET WASTE ACCUMULATION STANDARDS

(For generators who accumulate waste in tanks or containers for 90 days or less)

40 CFR 263 - Subpart I Containers

YES NO N/A

- 265.170 - What type of containers are used for storage. Describe the size, type and quantity and nature of waste (e.g., 12 fifty-five gallon drums of waste acetone).
- There was a container with yellow HM waste sticker they filled with MCH waste. I assume the plant. It was not full. There were some 55 gallon drums outside on the sidewalk that*
- 265.171 - Do the containers appear to be in good condition, not in danger of leaking?
- had a leak*
- ✓* *Spiller*
- across the*
- top that*
- had a leak*
- However,*
- they did*
- not have*
- the*
- yellow*
- hazardous*
- waste*
- label.*
- Ma*
- 265.172 - Are hazardous waste stored in containers made of compatible materials?
- ✓* *Ma*
- 265.173(a) - Are all containers closed except those in use?*
- ✓* *Ma*
- 265.173(b) - Do containers appear to be properly opened, handled or stored in a manner which will minimize the risk of the container rupturing or leaking?*
- ✓* *Ma*
- 265.174 - Is the storage area inspected at least weekly?*
- ✓* *Ma*
- 265.176 - Are containers holding ignitable and reactive waste located at least 50 feet (15 meters) away from the facility's property line?*
- ✓* *Ma*
- 265.177 - Are incompatible waste stored separate from each other?*
- ✓* *Ma*
- across the*
- top that*
- had a leak*
- However,*
- they did*
- not have*
- the*
- yellow*
- hazardous*
- waste*
- label.*
- Ma*
- across the*
- top that*
- had a leak*
- However,*
- they did*
- not have*
- the*
- yellow*
- hazardous*
- waste*
- label.*
- Ma*
- across the*
- top that*
- had a leak*
- However,*
- they did*
- not have*
- the*
- yellow*
- hazardous*
- waste*
- label.*
- Ma*



40 CFR 265 Subpart J - Tanks

NY NO N/A

265.190 1) What are the approximate number and size of tanks containing hazardous waste?

2) Identify the waste treated/stored in each tank.

X

265.192 - General Operating Requirements

1) Are the tanks maintained so that there is no evidence of part, present, or risk of future leaks?

If no, please explain.

2) Are there leaking tanks?

3) Are all hazardous wastes or treatment residues being placed in tanks compatible with the tank material so that there is no danger of ruptures, corrosion, leaks or other failures?

4) Do uncovered tanks have at least 2 feet of freeboard or an adequate containment structure?

5) If waste is continuously fed into a tank, is the tank equipped with a means to stop the inflow from the tank? e.g. bypass system to a standby tank

265.194 - Inspections

1) Is the tank(s) inspected each operating day for a) discharge control equipment b) monitoring equipment c) level of waste in tank

2) Are the tanks and surrounding areas (e.g., dikes) inspected weekly for leaks, corrosion or other failures?

3) Are there underground tanks?

If yes, how many and can they be entered for inspection?

265.198 - Are ignitable or reactive wastes stored in a manner which protects them from a source of ignition or reaction?

If no, please explain.

265.199 - Does it appear that incompatible wastes are being stored separate from each other?

YES NO N/A

265.16 - Personnel Training

1) Have facility personnel successfully completed a program of classroom instruction or on-the-job training within 6 months of having been employed?

☒ ☐ ☐

If yes, have facility personnel taken part in an annual review of training?

☒ ☐ ☐

2) Is there written documentation of the following:

--job title for each position at the facility related to hazardous waste management and the name of the employee filling each job?

☐ ☒ ☐

--type and amount of training to be given to personnel in jobs related to hazardous waste management?

☐ ☒ ☐

--actual training or experience received by personnel?

☐ ☒ ☐

3) Are training records kept on all employees for at least 1 years?

☐ ☒ ☐

40 CFR 265 - Subpart C - Preparedness and Prevention

265.32 Does the facility comply with preparedness and prevention requirements including maintaining:

-- an internal communications or alarm system?

☒ ☐ ☐

-- a telephone or other device to summon emergency assistance from local authorities?

☒ ☐ ☐

-- portable fire equipment?

☒ ☐ ☐

-- water at adequate volume and pressure to supply water hose streams, foam producing equipment, etc.

☒ ☐ ☐

265.33 Is equipment tested and maintained?

☒ ☐ ☐

265.34 Is there immediate access to communications or alarm systems during handling of hazardous waste?

☒ ☐ ☐

265.35 Adequate aisle space?

☒ ☐ ☐

If no, please explain storage pattern.

In your opinion, do the types of waste on-site require all of the above procedures, or are some not needed? Explain.

☐ ☐ ☐

40 CFR 265 - Subpart D - Contingency Plan and Emergency Procedures

Does the facility have a written contingency plan for emergency procedures designed to deal with fires, explosions or any unplanned release of hazardous waste?

☐ ☒ ☐

1) Does the plan describe arrangements made with the local authorities?

☐ ☒ ☐

2) Has the contingency plan been submitted to the local authorities?

☐ ☒ ☐

3) Does the plan list names, addresses and phone numbers of Emergency Coordinators?

☐ ☒ ☐

4) Does the plan have a list of what emergency equipment is available?

☐ ☒ ☐

5) Is there a provision for evacuating facility personnel?

☒ ☒ ☐

6) Was there an emergency coordinator present or on call at the time of the inspection?

☒ ☒ ☐

*Mr. Broadkin said they have an evacuation plan. However, it was not available at the time of my inspection.*

Facility Name ULAND CORPORATION, INC.

Category 3C3

EPA ID Number N7D 091576538

Date of doc: 6/15/00

Confidential (Non CBI) ☐ <sup>15</sup> Confidential Page No. ☐

Non Confidential ☒

Copy ☐ Original ☒

FOIA Exempt ☐ Non FOIA Exempt ☒

Project Manager Signature [Signature]

**RCRA INSPECTION REPORT**  
**Ulano Corporation**  
**280 Bergen Street ( 110 Third Avenue)**  
**Brooklyn, NY 11217**

---

**6/15/00**

**Inspection Summary-280 Bergen Street:**

The inspectors reviewed the manifests of this facility and from a review of the manifests it was determined that the facility is a conditionally exempt small quantity generator. The inspectors and the facility representatives then proceeded on a tour of the facility. The facility has five laboratories on the second floor; two of the laboratories are for quality control and the other three are for Research and Development. Labs 1 and 4 were first visited; in each of the laboratories, there was one 5 gallon container used for satellite accumulation. In the 3 R & D labs, research is done to test the films to find out the resistance to various types of solvents. Small amount of solvents are smeared on the film and are left for periods of time to check for the resistance of the film. The lab technicians use a small amount of rags and paper towels to smear the films with solvent. At the time of the inspection, there was not any rags or paper towels stored. The facility representative was asked what was done with the rags and paper towels. The facility representative informed by the inspectors that the rags and paper towels were discarded in the regular garbage. The inspectors informed the facility that the paper towels and rags( about 10 pounds per month) would be hazardous waste because they are used for wiping listed hazardous waste(methanol, toluene). The facility stated that they will immediately treat the rags and paper towels as hazardous waste.

The next area visited was the hazardous waste container storage area. This area is located in the chemical storage room. There was one fifty five gallon container of hazardous waste stored. The amount of waste in the container was 70 pounds. The container was marked with the words "hazardous waste" and other words to identify the contents. The accumulation start date was January 1, 2000. The inspectors also toured the process area and there were no concerns.

**Observations**

This facility was inspected as a conditionally exempt small quantity generator. However, in future, due to a change in the facility's waste handling procedures, this facility may become a small quantity generator. Waste generated at this facility was transported to its sister facility at 601 Bergen Street. According to New York State interpretation of the RCRA regulations, this is permissible. This matter has been sent to EPA headquarters for review and until a resolution of this matter, this action cannot be listed as a violation.

**Violation**

Failure to make a hazardous waste determination.

**Recommendation**

The facility failed to make a hazardous waste determination of the rags and paper towels used in the labs and disposed of the waste in the regular trash. Due to the small amount of waste involved, my recommendation is that an NOV be sent to the facility.

---

## INSPECTOR'S MULTI-MEDIA CHECKLIST

Revised: May 1999

Facility Name: ULANO CORPORATION

Address: 280 BERGEN STREET  
BROOKLYN

ID No.: NYD 091576538

Contact: RAT DANIELS Phone: 718-622-5200

Inspector: ABDOUL JABAR Phone: 212-637-4131 Div./Br.: DECA-LEB

Date of Inspection: 6/7/00 6/15/00 Referred by LAN to: \_\_\_\_\_

Date of Referral: \_\_\_\_\_ [copy to C. Zafonte, MM Coordinator, for tracking.]

Referee is requested to provide an initial response within 3 weeks of the referral.

### **GENERAL GUIDANCE**

#### **VISUAL CUES OF POSSIBLE NON-COMPLIANCE WARRANTING INQUIRY**

- Sloppy housekeeping or poor maintenance in work and storage areas or laboratories.
- Stains or discoloration of soil, concrete, or floors in work areas.
- Distressed vegetation - unhealthy, discolored, or dead.
- Dark smoke or dust clouds, or smoke coming from other than a smoke stack.
- Unusual odors or strong chemical smells.
- Sheen on surface waters.

#### **CHECK IT OUT!**

- o ... if you see or hear something suspicious during an inspection. Ask probing questions:
  - What is it? Is it a waste product?
  - What process produced it?
  - Has it been tested?
  - Where do you normally dispose of it?
  - Do you have a permit for the disposal?
  - How long has the circumstance existed?
  - When did it begin?
- o Pay attention to the situation, and take photographs.
  - Note the location and the amount of pollutant that appears to be involved.
  - Take notes describing the situation, the source of the pollutant and its emission point.

Oceans:		Doug Pabst	-3797
Public Water Supply:	7	Doug McKenna	-4244
Radiation:	7	Jeanette Eng	-4007
RCRA:	8	Joel Golumbek	-4140
Remedial Actions in	NJ:	Carole Petersen	-4418
	NY & Caribbean:	John Lapadula	-4262
Removal Actions:		Richard Salkie	732-321-6658
		Bruce Sprague	-6656
SPCC/FRP:	9	Doug Kodama	732-906-6905
TSCA:	10	Dan Kraft	732-321-6669
PCBs		Dave Greenlaw	732-906-6817
Chemicals		Mike Bious	732-906-6892
UST:	11	John Kushwara	212-637-4232
Wetlands:	11	Daniel Montella	3801
<u>Criminal Investigations Division</u> -	11	William V. Lometti	3634

If YES: Does facility have Recovery/Recycle or Recovery only equipment? YES, NO\*

hazardous substance in excess of the Superfund reportable quantity (assume 1 lb.)?

YES\* **NO**

If YES: Was notification of the release provided?

YES NO\*

If YES: i. To whom was the notification given? \_\_\_\_\_

ii. Was notification oral or written? \_\_\_\_\_

iii. If oral, was a written, follow-up report submitted? \_\_\_\_\_

YES NO\*

[If the facility does not know the answers to any of i, ii, or iii questions, \*REFER\*.]

- Does the facility have on site Material Safety Data Sheets (MSDS) for all hazardous chemicals used, as required under OSHA's Hazard Communication Standard?

**YES** NO\*

- If the facility has >10,000 lb of any hazardous chemicals, or Extremely Hazardous Substances >threshold planning quantities, have MSDS (or a list of MSDS), and chemical inventory forms been given to state and local emergency planning authorities and the local fire department? YES NO\*

#### **Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)**

N.B.: If you answer NO to the 1st question in any of the following 4 sections, skip that section & go to the next section.

#### **1. If inspecting a manufacturing facility, ask:**

A. Are any pesticides manufactured, relabeled, or repackaged at this establishment?

YES **NO**

Pesticide is any substance or mixture intended (1) to prevent, destroy, repel, or mitigate any pest, or (2) for use as a plant regulator, defoliant, or desiccant.

B. If A. is YES, does the establishment have an EPA Establishment Number?

YES NO\*

All production, relabeling and/or repackaging must be registered with EPA.)

C. If B. is Yes, enter the Establishment Number: \_\_\_\_\_ and continue:

D. Has the company filed the Annual Pesticide Production Report form?

YES NO\*

(due March 2 of each year for the previous calendar year's production.)

#### **2. If inspecting a storage-distribution facility or a retail facility, ask:**

**NA**

A. Are any pesticides being held for sale/distribution, or stored at this facility (warehouse)?



YES\* NO

**Note:** If you suspect, but are unsure, that pesticides are being sold in unlabeled containers, or with hand-written labels, \*REFER\* this.

**NPDES, Pretreatment & UIC**

1. Does the facility generate industrial wastes/wastewater (IW), sanitary wastewater (WW) and/or storm water (SW) and dispose of any of it as follows (Circle as applicable):
- a. To a receiving stream/surface water body (or onto ground near enough to impact one)?.....  
IW WW SW
- b. To a sanitary sewer system that discharges to a municipal treatment plant (POTW)?.....  
IW WW SW
- c. To a storm water sewer system?.....  
IW\* WW\* SW
- d. To a subsurface disposal system (septic system, drywell, cesspool, sinkhole)?.....  
IW\* WW SW
- e. Is any of it trucked off site?.....  
IW WW SW
- f. Onto ground surface (e.g. spray, discharge pipe, open trench) .....  
IW WW SW

Identify the water bodies and/or sewer system:

\_\_\_\_\_

- 2a. Are there floor drains, sinks (not in bathrooms), or storm water collection structures:
- where raw materials, products, wastes or wastewaters are generated, stored or transported &/or
  - that are possibly receiving wastes due to poor housekeeping, etc.?

YES NO

- b. If yes to a, is there fluid in the drain/structure?

YES NO

- c. If yes to a, is there evidence that contaminants entered drain/structure?

YES\* NO

(e.g., discolored or smelly fluid; stained drain or floor nearby)

- d. Ask what types of fluids enter drains/structures:
- \_\_\_\_\_

YES NO

2. If YES, does the facility have a state or federal radiation license for them?  
YES NO\*

8. Do chemicals or wastes appear to have been discharged to the environment through improper handling, leaks, spills, dumping or other discharges?

YES\* NO

9.A. Does facility generate non-hazardous process wastes, excl. office paper, cafeteria wastes, etc?

YES NO

If NO, go to Question 10. If YES, continue:

B. Does the facility handle process wastes, such as treatment sludges, ash, solvents, waste oils, spent catalysts, acids or bases?

YES\* NO

If yes, please briefly describe the process(es) that generate these wastes .

---

10. Does waste generation, handling, management or disposal appear to, or threaten to, cause environmental damage?

YES\* NO

## Toxic Substances Control Act (TSCA)

### Polychlorinated Biphenyls (PCBs)

**SAFETY WARNING:** Stay ten feet from any high voltage conductors.

1. Is there liquid-filled electrical equipment (transformers, capacitors) manufactured before 1980? YES NO

(Exclude equipment with <3 lb (1 quart) of fluid, but include only utility-owned equipment, if inspecting a utility.)

- A. If Yes, how many of the above are transformers containing: PCBs >500 ppm?

\_\_\_\_\_ \*

<500 ppm but ≥ 50 ppm?

\_\_\_\_\_ \*

fluid of unknown PCB concentration?

\_\_\_\_\_ \*

- B. If Yes, how many of the above are capacitors?

\_\_\_\_\_ \*

2. Are there hydraulic systems manufactured before 1980 that use/used high temperature fluid? YES NO

- A. If Yes, has each system been tested for PCBs?

YES NO\*

- B. Do any currently have PCB concentrations ≥ 50 ppm?

YES\* NO

3. Does the facility have any oil-filled heat transfer systems manufactured before 1980?

YES NO

- A. If Yes, has each system been tested for PCBs?

YES NO\*

- B. Do any currently have PCB concentrations >50 ppm?

YES\* NO

4. Does the facility have PCB waste stored for disposal?

YES\* NO

**OBSERVE PCB Items (transformers, capacitors, containers)**

- Are any leaking?

YES\* NO

### Underground Storage Tanks (USTs)

Does any UST have >10% volume underground and contain petroleum products or CERCLA hazardous substances?

☒ YES ☐ NO

Do all USTs store fuel oil for on-site heating?

☒ YES ☐ NO

If YES, the facility is exempt. Do not complete the rest of the UST questions.

Name the petroleum product or hazardous substance in each UST. \_\_\_\_\_

Is there evidence of UST leakage/spillage?

YES\* NO

\* Refer facility to the Water Compliance Branch.

### Wetlands

1. A. Are wet areas (marshes, swamps, bogs) on or adjacent to the site?

(A federal wetland need not have standing water or wetland-type vegetation; some wetlands have shrubs and trees.)

YES

☒ NO

B. Are there any waterbodies or waterways on or adjacent to the site?

YES NO

2. If # 1. A OR B is YES, is any clearing, filling, dredging, ditching, construction, etc. being conducted on or over the areas, or is there any evidence that such activities occurred very recently?

YES

☒ NO

3. If YES, when was the work undertaken? \_\_\_\_\_

Does the facility have any permits for this work?

YES NO\*

4. If YES, what agency(s) issued the permits? \_\_\_\_\_

e.g., U.S. Army Corps of Engineers; State environmental agency.

For federal permits, what type of permits are they (i.e., nationwide, regional, individual)?

\_\_\_\_\_

# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 16, 2013 - 11:53 AM

Version 5.0

## User Selection Criteria

Location:	New York, all activities	Activity Location:	None Chosen
Handler ID:	NYD091576538	Group of IDs:	None Chosen
Handler Name:			
Handler Universe:	All Facilities Regardless of Universe		
Determined Date Range:	From: 10/01/1980 To: 08/16/2013		
Location County Code:	None Chosen	Evaluation Type:	
Location City:		Focus Area:	
Location Zip Code:		Violation Type:	
State District:	None Chosen	Display Code Descrip.:	Yes
Sort Order:	Region, State, Handler Name	Display Universes:	Yes

## Results

Data meeting the criteria you selected follows.

Total Pages:5      Total Handlers:1

## Report Description

This report presents available information from the Resource Conservation and Recovery Act Information System (RCRAInfo) about compliance evaluations, violations, and enforcement actions meeting the criteria supplied by the user. Evaluations showing no violations does not always indicate that no violations were determined. Violation without enforcement actions does not always mean no enforcement action will be issued. In order to avoid releasing enforcement sensitive information to the public the following information is not shown on the report: pending civil / judicial referrals, criminal actions and referrals, and State to EPA referrals; all other enforcement actions are released.

## Report Information

Name: crme\_foia.rtf  
Developed by: EPA Headquarters, Office of Enforcement and Compliance Assurance  
Deployed: June 2006  
Last Updated: May 2012  
Contact: rcrainfo.help@epa.gov  
Tables Used: crmecomp3, citation3, hreport\_univ5, lu\_citation, lu\_state, hld\_groups  
Libraries: none

# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

Report run on: August 16, 2013 - 11:53 AM

ULANO CORP										County Name / Code: KINGS / NY047										NYD091576538										REGION 02																																							
Location: 280 BERGEN ST, BROOKLYN, NY 11217																																																																					
Mailing: 255 BUTLER ST, BROOKLYN, NY 11217																																																																					
Activity Location: NY										State District: NYSDEC R2										Accessability:										Non-Notifier:										Extract Flag: Y										Active Site: Y																			
Generator: CEG										Transporter: N										Operating TSDF: N										IC in Place: N										EI Indicator (HE / GW)N / N																													
Short-Term Gen: N										Transfer Facility: N										Offsite Receiver: H3M4																																																	
Full Enforcement: N										Converter: N										State Unaddressed SNC: N										EPA Unaddressed SNC: N																																							
CA Wkld: N										State TSDF: N										State Addressed SNC: N										EPA Addressed SNC: N																																							
Active State Gen: N																				State SNC w/Comp Sched: N										EPA SNC w/Comp Sched: N																																							
SCEI Evaluation: 02/28/2001										Activity Location: NY										Type: 261A										Disclaimed Date: 02/28/2001										Determined by Agency: State										Responsible Agency: State																			
SCEI Evaluation: 02/28/2001										Activity Location: NY										Type: 261A										Actual Compliance Date: 06/01/2001										RTC Qualifier: OBSERVED										Sequence Number: 4																			
Citizen Complaint: NO										Multimedia Inspection: NO										Sampling: NO										Identifer: 001										Person: NYHHN										Branch: R2										Found Violation: YES									
Enforcement: Activity Location: NY										Type: 120										Action Date: 04/11/2001										Identifer: 001										Branch: R2										Appeal Resolved:																			
Docket: CA Component: N										Disposition Status:										Agency: State										Responsible Person: NYHHN																																							
SCEI Evaluation: 08/15/2000										Activity Location: NY										Type: 262A										Determined Date: 08/15/2000										Determined by Agency: EPA										Responsible Agency: EPA																			
SCEI Evaluation: 08/15/2000										Activity Location: NY										Type: 262A										Actual Compliance Date: 07/28/2000										RTC Qualifier: DOCUMENTED										Sequence Number: 1																			
Citizen Complaint: NO										Multimedia Inspection: NO										Sampling: NO										Identifer: 000										Person: R2AHJ										Branch: RCB										Found Violation: YES									
Enforcement: Activity Location: NY										Type: 120										Action Date: 07/09/2000										Identifer: 001										Branch: RCB										Appeal Resolved:																			
Docket: CA Component: N										Disposition Status:										Agency: EPA										Responsible Person: R2AHJ																																							
SCEI Evaluation: 10/27/1992										Activity Location: NY										Type: 262A										Determined Date: 12/04/1992										Determined by Agency: State										Responsible Agency: State																			
SCEI Evaluation: 10/27/1992										Activity Location: NY										Type: 262A										Actual Compliance Date: 01/14/1993										RTC Qualifier: OBSERVED										Sequence Number: 3																			
Citizen Complaint: NO										Multimedia Inspection: NO										Sampling: NO										Identifer: 000										Person: NYSAN										Branch: R2										Found Violation: YES									
Enforcement: Activity Location: NY										Type: 120										Action Date: 12/04/1992										Identifer: 000										Branch: R2										Appeal Resolved:																			
Docket: CA Component: N										Disposition Status:										Agency: State										Responsible Person: NYSAN																																							
SCEI Evaluation: 07/06/1988										Activity Location: NY										Type: 262A										Determined Date: 07/06/1988										Determined by Agency: State										Responsible Agency: State																			
SCEI Evaluation: 07/06/1988										Activity Location: NY										Type: 262A										Actual Compliance Date: 01/27/1989										RTC Qualifier: OBSERVED										Sequence Number: 2																			
Citizen Complaint: NO										Multimedia Inspection: NO										Sampling: NO										Identifer: 002										Person: NYDEC										Branch: R2										Found Violation: YES									
Enforcement: Activity Location: NY										Type: 120										Action Date: 12/04/1992										Identifer: 000										Branch: R2										Appeal Resolved:																			
Docket: CA Component: N										Disposition Status:										Agency: State										Responsible Person: NYSAN																																							

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# FOIA Report of Non-Sensitive Compliance Monitoring and Enforcement Data

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## ULANO CORP, NYD091576538, BROOKLYN, NY, continued -

Enforcement:	Activity Location: NY	Type: 120	Action Date: 08/01/1988	Identifier: 002	Appeal Resolved:
Docket:		Agency: State	Responsible Person: NYDEC	Branch:	
CA Component: N		Disposition Status:	Appeal Initiated:		
<b>08/15/1984</b>					
Activity Location: NY	Type: 262.A	Determined Date: 08/15/1984	Determined by Agency: State	Responsible Agency: State	Sequence Number: 1
Scheduled Compliance Date: 03/28/1985		Actual Compliance Date: 05/27/1985	RTC Qualifier: OBSERVED		
CEI Evaluation	08/15/1984	Activity Location: NY	By: State	Identifier: 001	Person: Branch:
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: Found Violation: YES
Enforcement:	Activity Location: NY	Type: 120	Action Date: 02/28/1985	Identifier: 001	Appeal Resolved:
Docket:		Agency: State	Responsible Person: NYDEC	Branch:	
CA Component: N		Disposition Status:	Appeal Initiated:		
<b>02/13/2012</b>					
CEI Evaluation	02/13/2012	Activity Location: NY	By: EPA	Identifier: 001	Person: R2KS Branch: DESA Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: 02/13/2012 Focus Area:
CEI Evaluation	08/20/1998	Activity Location: NY	By: EPA	Identifier: 000	Person: R2MD Branch: R08 Found Violation: NO
Citizen Complaint: NO		Multimedia Inspection: NO	Sampling: NO	Not Subtitle C: NO	Day Zero: Focus Area:

Total Number of Handlers: 1

Total Number of Activity Locations: 1

\* End of Report \*

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## Description of codes used on the report:

Universes	Description of Universes
Generator	Indicates that the facility is a Large Quantity Generator (LQG), Small Quantity Generator (SQG), Conditionally Exempt Small Quantity Generator (CEG), or not a generator (N).
Transporter	Indicates that the facility transports waste subject to RCRA regulations. ("Y" indicates that the facility is in this universe).
Operating TSDF	Indicates that the facility is a Treatment, Storage or Disposal facility subject to any type of enforcement. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
IC in Place	Indicates that the facility has Institutional Controls in place. ("Y" indicates that the facility is in this universe).
EI Indicator (HE / GW)	Indicates that the facility has controls in place for Environmental Indicators. HE - Human Exposures ("+" indicates the exposure exists and is under control; "-" indicates the exposure exists and is not under control; "N" indicates the exposure does not exist) GW - Groundwater Release ("+" indicates the exposure exists and is under control; "-" indicates the exposure exists and is not under control; "N" indicates the exposure does not exist)
Short-Term Gen	Indicates that the facility is a short term or one time event generator and not generating from ongoing processes.
Transfer Facility	Indicates that the facility transfers hazardous waste.
Offsite Receiver	Indicates that the facility, whether public or private, currently accepts hazardous waste from another site (site identified by a different EPA ID).
HSM	Indicates that the facility manages hazardous secondary material(s) (e.g. spent material, by-product or sludge) that when discarded, would be identified as hazardous waste.
Subpart K	Indicates that the facility has opted into the subpart K laboratory rule. It then specifies the type of facility (C - College or University; H - Teaching Hospital; N - Non-profit Research Institute; W - withdrawal from the rule)
Full Enforcement	Indicates that the facility is a Treatment, Storage or Disposal facility which is part of the Full Enforcement universe. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
CA Workload	Indicates that the facility is part of the Corrective Action Workload universe. ("Y" indicates that the facility is in this universe).
Active State Gen	Indicates that the facility is an Active State Generator. ("Y" indicates that the facility is in this universe).
Converter	Indicates that the facility is a Converter Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State TSDF	Indicates that the facility is a State Treatment, Storage or Disposal facility. It then specifies the type of facility (L - Land Disposal; I - Incinerator; B - BIF; S - Storage; T - Treatment)
State Unaddressed SNC	Indicates that the facility is a State Unaddressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
State Addressed SNC	Indicates that the facility is a State Addressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
State SNC w/ Compl. Sched	Indicates that the facility is a State Significant Non-Complier with a Compliance Schedule. ("Y" indicates that the facility is in this universe).
EPA Unaddressed SNC	Indicates that the facility is an EPA Unaddressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
EPA Addressed SNC	Indicates that the facility is an EPA Addressed Significant Non-Complier. ("Y" indicates that the facility is in this universe).
EPA SNC w/ Compl. Sched	Indicates that the facility is a EPA Significant Non-Complier with a Compliance Schedule. ("Y" indicates that the facility is in this universe).

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## Description of codes used on the report:

ACCESSIBILITY - Indicates the reason why the handler is not accessible for normal RCRA tracking and proceeding (previously called Bankrupt Indicator):	
Code	Description
B	Indicates that the handler has filed for bankruptcy and bankruptcy litigation is in process.
C	Indicates that all RCRA responsibilities for permitting/closure, corrective action, and compliance monitoring and enforcement at the facility have been formally transferred to the CERCLA program or state equivalent.
F	Indicates that all responsible parties (owners/operators) for the handler have fled the country or are otherwise not available for prosecution.
L	Indicates that the handler's case is tied up in litigation to the extent that further progress in achieving RCRA compliance through normal enforcement is not possible.

NON-NOTIFIER - Indicates that the handler has been identified through a source other than Notification and is suspended of conducting RCRA-regulated activities without proper authority:	
Code	Description
E	Indicates that the handler was initially a non-notifier, subsequently determined to be exempt from requirements to notify.
O	Indicates that the handler is a former non-notifier.
X	Indicates that the handler is a non-notifier.

Violation Type	Description
261.A	LISTING - GENERAL
262.A	GENERATORS - GENERAL

Evaluation Type	Type Description
CEI	COMPLIANCE EVALUATION INSPECTION ON-SITE

Enforcement Type	Enforcement Description
120	WRITTEN INFORMAL

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